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January 10, 2018

Hon. Ramon E. Reyes, USMJ  
United States District Court for the  
Eastern District of New York  
225 Cadman Plaza E  
Brooklyn, New York 11201  
*VIA ECF*

**Re: Montes v. Finest Deli & Grocery Corp. et al.**  
**Docket No.: 17-cv-05040 (ARR) (RER)**

Dear Judge Reyes,

I represent Plaintiff in this action. I write respectfully to request an extension of time, until February 9, 2018 to file Plaintiff's Motion for Default Judgment pursuant to Your Honor's December 11, 2017 text order. This is the first request of this kind. There is no prejudice to any party.

The reason for this request is as follows. On November 28, 2017, my 83 year old mother passed away in Warsaw, Poland. I immediately flew out to Poland to organize her funeral and handle her affairs. While in Poland, I have had limited internet access and communication with my office staff. I just returned to my office today. For these reasons, I will be unable to complete the motion by today's deadline.

On January 3, 2018, Plaintiff served Defendants with an additional copy of the Summons and Complaint, the Clerk's notation for default, and Your Honor's December 11<sup>th</sup> text order directing Plaintiff to move for default judgment within thirty (30) days. As of today, Defendants have failed to Answer or otherwise appear in the action. Therefore, Defendants will not be prejudiced by the requested extension.

Accordingly, I respectfully request an extension of time, until February 9, 2018 to file Plaintiff's Motion for Default Judgment.

Thank you for your attention to the foregoing.

Respectfully submitted,  
-----/s/-----  
Robert Wisniewski